

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

Court File No. 17-cv-03058 (SRN/HB)

v.

Lindsey Middlecamp,

Defendant.

Brock Fredin,

Plaintiff,

Court File No. 18-cv-00466 (SRN/HB)

v.

Grace Elizabeth Miller, et al.,

Defendant.

DECLARATION OF K. JON BREYER

I, K. Jon Breyer, declare as follows:

1. I am an attorney with the law firm of Kutak Rock LLP and counsel to Defendants in the above-captioned matters. I submit this affidavit in support of Defendants' Motion for Sanctions.

2. Attached hereto as **Exhibit A** are pages of the Deposition of Brock Fredin taken December 5, 2019, that are reference in Defendants' Memorandum of Law in support of their Motion for Sanctions.

3. Attached hereto as **Exhibit B** is Exhibit 13 to Fredin's deposition, which depicts a website believed to have been created by Fredin and that contains information that he, personally, made public. This is the same information that he claims is defamatory.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 7th day of February, 2020 at Minneapolis, Minnesota.

/s/K. Jon Breyer

K. Jon Breyer